UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

CITIZENS AWARENESS)

NETWORK, INC.,)

Plaintiff,)

v.) No. 04cv30114-MAP

UNITED STATES OF AMERICA,)

UNITED STATES NUCLEAR)

REGULATORY COMMISSION,)

Defendant.)

MOTION FOR LEAVE TO FILE REPLY MEMORANDUM

The defendants, the United States of America and the United States Nuclear Regulatory Commission, by their attorney, Michael J. Sullivan, United States Attorney for the District of Massachusetts, move for leave to file a reply memorandum in support of their motion to dismiss. The defendants believe that a reply is necessary to address issues raised by the plaintiff's opposition memorandum. The defendants propose to file the reply by August 31, 2004.

In accordance with Local Rule 7.1, the undersigned Assistant U.S. Attorney certifies that she consulted with the plaintiff's counsel and he does not assent to the filing of this reply.

Respectfully submitted,

MICHAEL J. SULLIVAN United States Attorney

By: /s/Karen L. Goodwin KAREN L. GOODWIN

Assistant U.S. Attorney 1550 Main Street, Room 310 Springfield, MA 01103-1422

(413) 785-0269

DATED: August 25, 2004

CERTIFICATE OF SERVICE

This is to certify that I have this day served upon the person listed below a copy of the foregoing document by depositing in the United States mail a copy of same in an envelope bearing sufficient postage for delivery:

Jonathan M. Block, Esquire 94 Main Street P.O. Box 566 Putney, VT 05346-0566

Robert L. Quinn, Esquire Egan, Flanagan and Cohen, P.C. 67 Market Street P.O. Box 9035 Springfield, MA 01102-9035

This 25th day of August, 2004.

/s/Karen Goodwin Karen L. Goodwin

KAREN L. GOODWIN ASSISTANT UNITED STATES ATTORNEY